

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

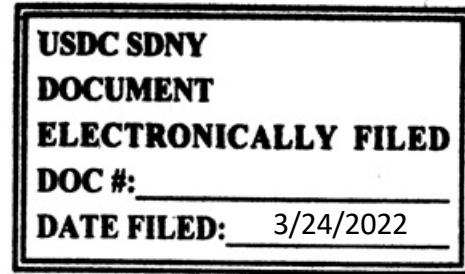
Rohan Ramchandani,

Plaintiff,

-against-

CitiBank National Association et al.,

Defendants.



1:19-cv-09124 (VM) (SDA)

ORDER

**STEWART D. AARON, UNITED STATES MAGISTRATE JUDGE:**

Following a telephone conference with the parties and a representative of the U.S. Department of Justice (“DOJ”) on March 23, 2022, for the reasons set forth below, as well as the reasons stated on the record, the Court hereby ORDERS, as follows:

1. The DOJ deposition shall proceed promptly on a date when the DOJ witness is available that is mutually convenient to the parties.<sup>1</sup> The Court previously had adjourned the DOJ deposition, which had been scheduled for December 8, 2021, until a date after document production was substantially complete. (See Mem. End., ECF No. 55.) The substantial completion deadline initially was set for January 21, 2022 (see 11/27/21 Order, ECF No. 57), but was extended at the request of the parties to February 11, 2022. (See 1/14/22 Order, ECF No. 59.) Based upon its review of the record before it, the Court finds, in its discretion, that there is no just reason for further delay of the DOJ deposition.

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<sup>1</sup> The Court was prepared to Order that the DOJ deposition go forward, as scheduled, on March 25, 2022, but for the family medical issue raised by Plaintiff’s counsel during yesterday’s conference.

2. The deposition of Plaintiff shall proceed promptly on a date that is mutually convenient to the parties.<sup>2</sup>
3. The deposition of Jeffrey Feig (“Feig”) shall be held in abeyance pending resolution of any disputes regarding privilege assertions as to documents authored by Feig or sent directly to Feig as a recipient (as opposed to as a “cc” or “bcc”).
4. The parties immediately shall meet and confer regarding the privilege log produced by Defendants in order to provide more information (in a non-burdensome way) so that Plaintiff may challenge Defendants’ assertions of privilege. For example, Defendant may consider creating a metadata log and/or the parties can agree that the Defendant provide greater detail for a discrete subset of documents on the log (*e.g.*, limited to specific custodians and/or date ranges). The parties also promptly shall meet and confer regarding Defendant’s assertions of privilege.
5. The parties promptly shall meet and confer with respect to discovery disputes regarding custodial discovery and Defendants’ communications with regulators in connection with their FX spot market–related investigations.
6. The Court expects the parties to negotiate in good faith and to make reasonable compromises during the meet and confer sessions required by paragraphs 4 and 5 hereof. If the parties are unable to reach a consensual resolution, then no later than Thursday, April 21, 2022, they shall file a joint letter not to exceed 12 pages setting forth each side’s position regarding the disputed issues. The Court expects any issues raised to be targeted and specific. If any disputes exist regarding assertions of

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<sup>2</sup> The Court was prepared to Order that the Plaintiff’s deposition go forward, as scheduled, on March 31, 2022, but for the family medical issue referred to in footnote 1 above.

privilege, then each side may designate for *in camera* review by the Court a sample of no more than ten documents in no more than five categories of withheld documents, in which case such designated documents shall be sent to the Court (500 Pearl Street, Room 1970, New York, NY 10007) on a thumb drive for receipt by the Court no later than 12 noon on Friday, April 22, 2022.

7. The deadline for completion of all discovery (including any expert discovery) is May 27, 2022. This deadline may be extended for good cause shown, but only for limited, specific purposes.

8. This Order supersedes all prior scheduling orders regarding discovery.

The parties are directed to provide a copy of this Order to the DOJ representative. The Clerk of Court is respectfully requested to terminate the gavel at ECF No. 60.

**SO ORDERED.**

Dated: New York, New York  
March 24, 2022



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STEWART D. AARON  
United States Magistrate Judge